

**UNITED STATES BANKRUPTCY COURT
FOR THE EASTERN DISTRICT OF VIRGINIA**
Alexandria Division

In re:

JULIANA RIAHI

Debtor.

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Case No. 13-11487-RGM
Chapter 7

**NOTICE OF MOTION FOR TURNOVER, HEARING THEREON AND
DEADLINE FOR FILING OPPOSITIONS THERETO**

Donald F. King, Trustee ("Trustee"), by counsel, has filed a motion for turnover for the property of the bankruptcy estate located a certain Safe Deposit Box jointly leased by the Debtor and Ana Vlalukin from Wells Fargo Bank, National Association. A copy of the motion and proposed consent order are attached hereto.

Your rights may be affected. You should read these papers carefully and discuss them with your attorney, if you have one in this bankruptcy case. (If you do not have an attorney, you may wish to consult one.)



On or before THREE (3) DAYS BEFORE THE SCHEDULED HEARING DATE STATED BELOW, file with the Court, at the address shown below, a written response with supporting memorandum as required by Local Bankruptcy Rule 9013-1(H). **Unless a written response and supporting memorandum are filed and served by the date specified, the Court may deem any opposition waived, treat the motion as conceded, and issue an order granting the requested relief without further notice or hearing.** If you mail your response to the Court for filing, you must mail it early enough so the court will **receive** it on or before the date stated above. You must **also** mail a copy to the persons listed below. The address for the Court is as follows:

Clerk of the Court
U.S. Bankruptcy Court
200 South Washington Street
Alexandria, Virginia 22314

LAUREN FRIEND MCKELVEY, ESQUIRE (VSB No. 78813)
Counsel for Trustee
ODIN FELDMAN & PITTLEMAN PC
1775 Wiehle Avenue, Suite 400
Reston, Virginia 20190
Phone: 703-218-2135
Fax: 703-218-2160
Lauren.McKelvey@ofplaw.com

- ☒ A copy of any written response must be mailed to the following persons:

Lauren Friend McKelvey, Esquire
Counsel for Donald F. King, Trustee
ODIN FELDMAN & PITTLEMAN PC
1775 Wiehle Avenue, Suite 400
Reston, Virginia 20190

You must also:

- ☒ Attend the hearing scheduled to be held on **April 14, 2015, at 9:30 o'clock a.m.** at the United States Bankruptcy Court, 200 South Washington Street, Alexandria, Virginia 22314. **If no timely response has been filed opposing the relief requested, the Court may grant the relief without holding a hearing.**

If you or your attorney do not take these steps, the Court may decide that you do not oppose the relief sought in the motion or objection and may enter an order granting that relief.

DONALD F. KING, TRUSTEE
By Counsel

By: /s/ Lauren Friend McKelvey
Lauren Friend McKelvey, Esquire (VSB No. 78813)
Counsel for Trustee
ODIN FELDMAN & PITTLEMAN PC
1775 Wiehle Avenue, Suite 400
Reston, Virginia 20190
Phone: 703-218-2135
Fax: 703-218-2160
Lauren.McKelvey@ofplaw.com

CERTIFICATE OF SERVICE

I HEREBY CERTIFY that a true and accurate copy of the foregoing Notice, with Motion and proposed Order attached, was sent by U.S. mail, first class postage prepaid, on the 30th day of March, 2015, to the following:

Juliana Riahi
1226 Potomac School Road
McLean, VA 22101
and
39 Main Street
Wachapreague, VA 23480

Richard L. Ferrell
Senior Counsel
Wells Fargo Law Dept.
MAC: D1053-300
301 South College Street
Charlotte, NC 28288

Ana Vlalukin
Apt 3A
244 East 60th Street
New York, N710022

Samantha Simmons Fredieu
Counsel to Ana Vlalukin
Hale Ball Carlson Baumgartner Murphy, PLC
10511 Judicial Drive
Fairfax, VA 22030

and via Notice of Electronic Filing upon Counsel to Debtor, the Office of the U.S. Trustee, Counsel for First Virginia Community Bank , and all registered users in this case pursuant to this Court's CM/ECF policy.

/s/ Lauren Friend McKelvey
Lauren Friend McKelvey, Esquire

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